

Attorneys for Defendant  
Northwest Airlines, Inc.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

	)	Case No. C 03-04957 MMC
	)	
WILLIAM R. KLEMMER, M.D.,	)	<b>REVISED STIPULATION AND</b>
	)	<b><del>[PROPOSED]</del> ORDER FOR AN EXTENSION</b>
Plaintiff,	)	<b>OF EXPERT DISCOVERY DEADLINES</b>
	)	
v.	)	[ Civil LR 6-1 (b), 6-2 (a).]
	)	
NORTHWEST AIRLINES, INC.; BLACK	)	
COMPANY; WHITE COMPANY; BLUE	)	Complaint filed: September 6, 2003
COMPANY; RED COMPANY; and DOES 1	)	
through 100, inclusive,	)	Trial Date: August 20, 2007
	)	(reset after case reopened
Defendants.	)	lifting bankruptcy stay)

Pursuant to this Court's March 21, 2007 Order denying the parties Stipulation for Extension of Expert Discovery Deadlines and Continue the Status Conference, the parties submit the following revised stipulation.

This case was automatically stayed September 22, 2005, as a result of Defendant's filing of a notice of bankruptcy. Prior to September 22, 2005, the trial in this matter had been continued four times, due to continued mediation efforts, Plaintiff's condition, and the need to obtain Plaintiff's VA medical records. It was not until February 2007, that Defendant received the long-awaited records of Plaintiff related to his pending disability claim with the Veteran's Administration that had been originally subpoenaed August 16, 2004, and September 1, 2004. Plaintiff appeared on April 13,

2007, for further deposition re the recent medical records, amongst others not previously produced.

Counsel for the parties met March 21, 2007 with mediator William Strickland for further mediation, and have agreed to a further mediation June 27, 2007.

In light of the recent receipt of vital records, further deposition of Plaintiff and the parties' continued mediation efforts with mediator, William R. Strickland, the parties hereto, by and through their respective counsel, hereby agree and stipulate, pursuant to Civil L.R. 6-1 (b), 6-2, and 16-2, to an extension of expert discovery.

The parties hereto, by and through their respective counsel, hereby agree and stipulate to extend discovery deadlines, as follows:

1. Experts shall be disclosed and reports provided by plaintiff and defendant by 6/8/07. (set for March 30, 2007)
2. Rebuttal experts shall be disclosed and reports provided 6/15/07. (set for 4/13/07)
3. All discovery from experts shall be completed by 6/26/07. (presently set for 5/4/07)

This stipulation may be executed in counterparts by facsimile, each of which shall be deemed an original, but which taken together will constitute one and the same document.

IT IS SO STIPULATED.

Date: April 16, 2007

LAW OFFICES OF SARA A. SIMMONS, APC

By: \_\_\_\_\_/s/

Sara A. Simmons  
Attorneys for Defendant  
Northwest Airlines, Inc.

Date: April 16, 2007

LAW OFFICES OF J. FRANK GEORGE, APC

By: \_\_\_\_\_/s/

J. Frank George  
Attorneys for Plaintiff  
William R. Klemme, M.D.

1 APPROVED AND ORDERED:

2 Experts shall be disclosed and reports provided by plaintiff and defendant by June 8,  
3 2007.

4 Rebuttal experts shall be disclosed and reports provided by June 15, 2007.

5 All discovery from experts shall be completed by June 26, 2007.

6 Dated: April 16, 2007

7   
8 THE HONORABLE MAXINE M. CHESNEY  
9 United States District Court Judge  
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